

BALLON STOLL BADER & NADLER, P.C.

COUNSELLORS AT LAW

FOUNDED 1931

729 SEVENTH AVENUE
17TH FLOOR
NEW YORK, NY 10019-6831
Ph. 212.575.7900

www.ballonstoll.com
MARSHALL B. BELLOVIN
(212) 575-7900 ext. 3270
mbellovin@ballonstoll.com

April 6, 2016

VIA ECF

Honorable Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York NY 10007

Re: Shekar v. Delancey's Orchard LLC, et al.
Civil Action No. 15-CV-05022-ER
Our file No. 20019.001

Dear Judge Ramos:

We represent the Defendants, Delancey's Orchard LLC d/b/a Freshco Deli and Grocery, Pratik Shah, Kayum Mohammed, and Rishi Shah, in the above-referenced action. We write to respectfully request an extension of the non-expert discovery deadline from April 15, 2016 until May 20, 2016. The deadline for all discovery is on June 6, 2016, so the extension of time for non-expert discovery will not affect any of the other dates currently in place pursuant to your Honor's Civil Case Management Plan. Plaintiff's counsel has consented to this request.

The reason for Defendants' request is that Rishi Shah, one of the above-named Defendants, was scheduled to be deposed on April 5, 2016, but unexpectedly had to leave the country due to a death in his family. In light of his personal emergency, Mr. Shah is currently in India and we understand he will remain there until next week. Defendants' counsel plans to contact Plaintiff's counsel as soon as Mr. Shah returns next week to re-schedule his deposition. The deposition will be scheduled as soon as possible upon Mr. Shah's return, in order to insure the timely completion of all further discovery.

Respectfully submitted,



Marshall B. Bellovin, Esq. (MB 5508)
Member of the Firm
Counsel for Defendants

cc: Louis Pechman, Esq. (via ECF) AFFILIATE OFFICES
Counsel for Plaintiff Hackensack, NJ • Philadelphia, PA • San Francisco, CA
Dubai, U.A.E. • Moscow, Russia